

# EXHIBIT 3

## Stephen Stern

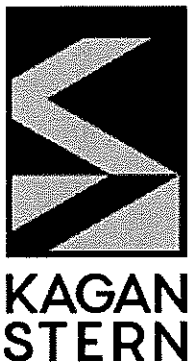
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**From:** Stephen Stern  
**Sent:** Thursday, October 14, 2021 7:41 PM  
**To:** Gregory Jordan; michaelwhite@comcast.net  
**Cc:** Thomas J. Gagliardo; Heather Yeung  
**Subject:** RE: Boshea v. Compass Marketing, Inc. - Response to Subpoena  
**Attachments:** Amended Notice of Deposition to Michael White (00154398xEC90E).pdf

Attached please find a copy of the Amended Notice of Deposition to reflect the new start time, as confirmed by my email below.

Greg – I will have access to WiFi if you prefer to participate by video. The deposition will take place in a conference room and I can set up my computer for you to participate via Teams.

Stephen



**Stephen B. Stern, Esq.**  
[stern@kaganstern.com](mailto:stern@kaganstern.com)

**Kagan Stern Marinello & Beard, LLC**  
(410) 793-1610 (direct)  
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(410) 705-0836 (fax)  
238 West Street  
Annapolis, Maryland 21401  
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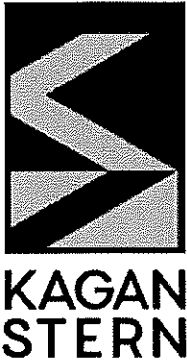
**From:** Stephen Stern  
**Sent:** Tuesday, October 5, 2021 8:42 AM  
**To:** Gregory Jordan <gjordan@jz-llc.com>; michaelwhite@comcast.net  
**Cc:** Thomas J. Gagliardo <tgagliardo@gelawyer.com>; Heather Yeung <yeung@kaganstern.com>  
**Subject:** RE: Boshea v. Compass Marketing, Inc. - Response to Subpoena

Greg:

I will find out about video possibility. Even if not offered through the court, I am sure I can set up my laptop so that we can have you participate via Teams. As a reminder, I am in trial this week and I will need to work out the logistics to confirm that after my trial. As for the start time, we can accommodate your request to start at 11:00 am EST. I will plan to send out a revised deposition notice after the trial or perhaps one night this week, but this email is confirming to everyone that the time will be 11:00 am.

As for Mr. Baggett's deposition, I was mistaken about the return date of his Assistant. She is on vacation until October 6 (not October 4). I will report back as soon as I hear back from her.

Stephen



**Stephen B. Stern, Esq.**  
[stern@kaganstern.com](mailto:stern@kaganstern.com)

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**From:** Gregory Jordan <[gjordan@jz-llc.com](mailto:gjordan@jz-llc.com)>  
**Sent:** Monday, October 4, 2021 2:59 PM  
**To:** Stephen Stern <[Stern@kaganstern.com](mailto:Stern@kaganstern.com)>; [michaelrwhite@comcast.net](mailto:michaelrwhite@comcast.net)  
**Cc:** Thomas J. Gagliardo <[tgagliardo@gelawyer.com](mailto:tgagliardo@gelawyer.com)>; Heather Yeung <[yeung@kaganstern.com](mailto:yeung@kaganstern.com)>  
**Subject:** Boshea v. Compass Marketing, Inc. - Response to Subpoena

Stephen,

I cannot be in Maryland on October 21<sup>st</sup>. Are you offering the opportunity to participate via a Zoom or Teams link? Also, I have a hearing that I have to attend that morning at 9:00 am in DeKalb, Illinois, which is a fair distance from my home and office. If I can participate by video, I ask that we start at 11:00 am Eastern time. Let me know.

Are we proceeding with Curt Baggett's deposition the following day?

Greg

Gregory J. Jordan

Licensed in Illinois and Indiana

**NOTE OUR NEW ADDRESS:**

Jordan & Zito LLC  
350 North LaSalle Street, Suite 1100  
Chicago Illinois 60654  
(312) 854-7181 (Office)  
(312) 543-7354 (Cellular)  
[gjordan@jz-llc.com](mailto:gjordan@jz-llc.com)

**\*\*Notice from Jordan & Zito LLC \*\***

To comply with United States Treasury regulations, I advise you that any discussion of Federal tax issues in this communication was not intended or written to be used and cannot be used by any person (a) to avoid penalties that may be imposed by the Internal Revenue Service, or (b) to promote, market or recommend to another party any matter addressed herein. This Internet message may contain information that is privileged, confidential, and exempt from disclosure. It is intended for use only by the person to whom this sender addressed the email. If you have received this in error, please do not forward or use this information. If an error has occurred, contact me immediately. I do not intend that my information block, typed name, or anything else in this message constitutes my electronic signature unless I make a specific statement contrary to this message.

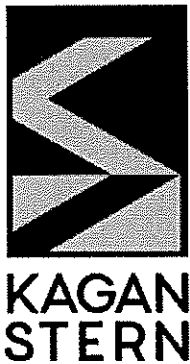
Jordan & Zito LLC

**From:** Stephen Stern <[Stern@kaganstern.com](mailto:Stern@kaganstern.com)>  
**Sent:** Friday, October 1, 2021 9:23 PM  
**To:** [michaelrwhite@comcast.net](mailto:michaelrwhite@comcast.net)  
**Cc:** Gregory Jordan <[gjordan@jz-llc.com](mailto:gjordan@jz-llc.com)>; Thomas J. Gagliardo <[tgagliardo@gelawyer.com](mailto:tgagliardo@gelawyer.com)>; Heather Yeung <[yeung@kaganstern.com](mailto:yeung@kaganstern.com)>  
**Subject:** RE: Boshea v. Compass Marketing, Inc. - Response to Subpoena

Michael:

Since I did not hear back from you, I have set the deposition for one of the dates noted below. Attached is a copy of the notice of deposition.

Stephen



**Stephen B. Stern, Esq.**  
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**From:** Stephen Stern  
**Sent:** Tuesday, September 28, 2021 6:04 PM  
**To:** [michaelrwhite@comcast.net](mailto:michaelrwhite@comcast.net)  
**Subject:** Boshea v. Compass Marketing, Inc. - Response to Subpoena

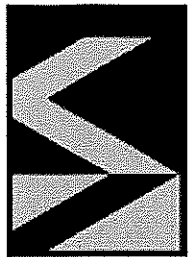
Michael:

As I am sure you know by now, the court has denied your motion to quash the subpoena that was served on you in the above-referenced matter (except to the extent that the subpoena sought documents related your communications with BizFilings/Compass Marketing's Registered Agent). In the event you did not already know the outcome, I have attached a copy of the court's order for you to review.

Please produce all responsive documents by October 4.

As for scheduling your deposition, please let me know your availability October 19, 20, and 21.

Stephen



**KAGAN  
STERN**

**Stephen B. Stern, Esq.**

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Northern Division)**

**DAVID J. BOSHEA**

**Plaintiff,**

**v.**

**COMPASS MARKETING, INC.**

**Defendant.**

**Case No. 1:21-CV-00309-ELH**

\* \* \* \* \*

**AMENDED NOTICE OF DEPOSITION OF MICHAEL R. WHITE**

PLEASE TAKE NOTICE THAT Defendant Compass Marketing, Inc., by and through its undersigned counsel and pursuant to the Federal Rules of Civil Procedure and the Local Rules of this Court, will take the deposition on oral examination of Michael R. White. This deposition notice follows the Court's Order denying your Motion to Quash and is in furtherance of the subpoena that was previously served on you. The deposition will take place at 8 Church Circle, Annapolis, Maryland 21401. The deposition will take place on the Fourth Floor, Conference Room 407, commencing at 11:00 a.m. on October 21, 2021, and may be continued from day to day or to such other date as may be necessary until completed. Please note that masks are required in the courthouse and must be worn at all times.

The deposition will be taken before a court reporter or other person authorized to administer oaths and will be conducted in accordance with the Federal Rules of Civil Procedure and the Local Rules of this Court. The deposition will be taken for the purposes of discovery, for use at trial in this matter, and for any other purpose permitted under the applicable rules. The deposition will be recorded stenographically and will be videotaped.

Dated: October 14, 2021

Respectfully submitted,

/s/ Stephen B. Stern

Stephen B. Stern, Bar No. 25335

Heather K. Yeung, Bar No. 20050

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*Counsel for Defendant*

*Compass Marketing, Inc.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 14th day of October, 2021, the foregoing Amended Notice of Deposition for Michael R. White was served via electronic mail to:

Thomas J. Gagliardo  
Gilbert Employment Law, PC  
1100 Wayne Avenue, Suite 900  
Silver Spring, MD 20910  
Email: [tgagliardo@gelawyer.com](mailto:tgagliardo@gelawyer.com)

and

Gregory J. Jordan  
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*Attorneys for Plaintiff*  
*David Boshea*

/s/ Stephen B. Stern  
Stephen B. Stern